

EXHIBIT 1

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

11 SHARON COBB, et al., individually) Case No. SACV10-711 DOC (ANx)
12 and on behalf of all other similarly)
13 situated,)
14 Plaintiffs,) **SUPPLEMENTAL DECLARATION OF**
15 v.) **ERIC ROBIN**
16 BSH HOME APPLIANCES) **RE: NOTICE PROCEDURES**
17 CORPORATION, a Delaware)
18 Corporation,)
19 Defendant.)
20

21 I, **ERIC ROBIN**, declare:

22 1. I am Consultant at Kurtzman Carson Consultants LLC ("KCC"), located at 75 Rowland
Way, Suite 250, Novato, California. I am over 21 years of age and am not a party to this action. I have
23 personal knowledge of the facts set forth herein and, if called as a witness, could and would testify
24 competently thereto. This declaration supplements the declaration I executed on February 27, 2015 and
25 is to provide the Court with updated information regarding the notice plan.

26 2. KCC was retained by the parties to serve as the Settlement Administrator to, among other
tasks, email the Notice of Class Action Settlement (the "Email Notice"); mail the Postcard Notice; mail
27 the Notice of Eligibility; place the Publication Notice and Internet Banner Notices; make the Full Notice
28

1 and Claim Form available to Class Members; receive and process Claim Forms; receive and process
2 requests for exclusion; receive and process objections to the settlement; and other class member
3 inquiries; and to establish and maintain a settlement website and perform other duties as specified in the
4 Settlement Agreement preliminarily approved by this Court on December 29, 2014. Copies of the Email
5 Notice, Postcard Notice, Notice of Eligibility, Full Notice, and Claim Form are attached hereto as
6 Exhibits 1 through 5, respectively.

7 3. **Mailed Notice and Emailed Notice.** On January 28, 2015, KCC mailed 141,463
8 Postcard Notices by First Class postage at KP Graphics in San Leandro, California to the Class
9 Members for whom a postal mailing address was known.

10 4. On January 28, 2015, KCC emailed the Email Notice to each of the 7,624 (2 email
11 addresses were determined to be invalid prior to dissemination) email addresses on the Class Member
12 List where no postal mailing address was known. This e-mail notice provided information regarding the
13 settlement, including a link to the Settlement Website, located at
14 www.BoschSiemensWashingMachinesClassAction.com, where Class Members could submit an online
15 Claim Form. As of February 24, 2015, KCC's e-mail server registered 5,097 emails (66.85%) as having
16 been successfully delivered and 2,527 (33.15%) as undeliverable.

17 5. On March 3, 2015, in compliance with paragraph III (D) of the Settlement Agreement
18 and Release, KCC sent 19,521 Notice of Eligibility postcards.

19 6. As of May 13, 2015, KCC has received a total of 283 Postcard Notices and 25 Notice of
20 Eligibility postcards returned by the U.S. Postal Service with forwarding addresses. KCC is in the
21 process of causing the Class Member List to be updated with the new addresses and Notice Packages to
22 be re-mailed to the Class Members at each of these new addresses. As of May 13, 2015, KCC has
23 received a total of 18,401 Postcard Notices and 454 Notice of Eligibility postcards returned by the U.S.
24 Postal Service without forwarding addresses. To date, KCC has conducted address searches using credit
25 and other public source databases to attempt to locate new addresses for 18,850 of these Class Members.
26 As of May 13, 2015, these searches have resulted in 12,478 updated addresses. KCC promptly re-
27 mailed Postcard Notices to the updated addresses and will continue to do so.

28 7. **Published Notices and Internet Banners.** KCC has arranged for the Publication Notice

1 to appear as a half page ad unit in *People* and *National Geographic*. The Notice appeared in each
2 publication on the dates and pages indicated below:

MEDIA	ISSUE DATE ¹	ON-SALE DATE ²	PAGE #
<i>People</i>	March 16, 2015	March 6, 2015	61
<i>People</i>	March 30, 2015	March 20, 2015	46
<i>National Geographic</i>	April 2015	March 31, 2015	19

7 To fulfill the notice requirement of California's Consumer Legal Remedies Act ("CLRA"), KCC
8 arranged for four eighth-page notices (approximately 4.53" x 4") to appear once a week for four
9 consecutive weeks in the *Orange County Register*. The Notices have appeared on the dates and pages
10 indicated below:

MEDIA	ISSUE DATE	PAGE/POSITIONING
<i>Orange County Register</i>	January 28, 2015	9/Sports
<i>Orange County Register</i>	February 4, 2015	9/Sports
<i>Orange County Register</i>	February 11, 2015	9/Sports
<i>Orange County Register</i>	February 18, 2015	9/Sports

17 KCC also arranged for Internet Banner Notices, targeted to adults 25 years of age or older, to appear on
18 a variety of websites. The internet banners began on January 28, 2015 and ended on March 27, 2015.

19 KCC has confirmed that in total 136,737,212 internet impressions were delivered. This represents
20 1,237,212 internet impressions more than the 136,500,000 impressions that were planned and
21 purchased.

22 8. In accordance with paragraph three of the previously submitted Declaration of Gina
23 Intrepido-Bowden submitted on December 12, 2014, the individual notice and media notice efforts
24 combined was expected to reach approximately 80% of the Class. The notice plan, as implemented in
25 strict accordance with the notice plan the Court approved on December 11, 2014, has in fact reached
26

27 _____
28 ¹ The date that appears on the publication cover.

² The date the publication becomes available to readers.

approximately 80.9% of the Class on average 1.7 times each.

9. **Requests for Exclusion.** The deadline for Class Members to request to be excluded from the class was a postmark deadline of April 30, 2015. As of May 13, 2015, KCC has received 30 timely filed Requests for Exclusion. A list of the individuals requesting exclusion is attached hereto as Exhibit A.

10. **Objections to the Settlement.** The deadline for Class Members to object to the settlement is a postmark deadline of April 30, 2015. As of May 13, 2015, KCC is aware of five objections to the settlement. A list of the individuals objecting is attached hereto as Exhibit B.

11. **Claim Forms.** As of the date of this declaration, 17,904 Claim Forms have been filed by Class Members. The deadline for Class Members to file a Claim Form is May 28, 2015 and additional timely claims are expected. KCC will provide a short supplemental declaration to the Court after May 28, 2015, reporting on the total number of claims received.

I declare under penalty of perjury pursuant to the laws of the State of California that the foregoing is true and correct to the best of my knowledge and that this declaration was executed this 15th day of May 2015 at Novato, California.

Eric Robin

Exhibit A

**KCC Class Action Services
Tait v. BSH Home Appliances Corporation
Exclusion Report**

Count
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ClaimID	Last Name	First Name
10008464301	BAUMGARDNER	KATHRYN
10010041701	BENOV	SUSAN L
10018275601	BYERS	FRANCES
10020655401	CARY	TIMOTHY
10030558101	DAVIS	JULIA
10031045001	DEAN	LINDA
10041872701	FLAKER	ROLLAND
10043316901	FRANDSEN	SUSAN
70000186401	FRIED	SHIRLEY
20006444701	GOYTOWSKI	ROSE
20006703501	GRUHIN	STEPHEN
900042001	HAZELET	SANDRA
10060686601	HOVANEC	MATT
10066905001	KAEPPLER	ROLF
10067668601	KARGES	STEPHANIE
10086509401	MAZZAWY	SALEM
10087570101	MCDONOUGH	KATE
10090891301	MILLER	DAVID
10095706701	NAFZGER	CARL
10107840701	POWERS	ROY
10120594601	SCHRONK	LEONARD
10121271901	SCOTT	KLARA
20016191001	SMITH	JASON
900039001	STONE	SHAWN
900037301	STRAUSS	FRED
10133973201	TEVES	CAROL M
10134148901	THEOPHILOS	CELESTE
10136573101	TREDOR	SOPHIE
10139311801	VECHEY	LINDA
10147183001	WOLTERS	RON

Exhibit B

KCC Class Action Services
Tait v. BSH Home Appliances Corporation
Objection Report

Count

5

ClaimID	Last Name	First Name
60005921101	AMEEN	BOBBY
10069264301	KERR	ROGER
900044701	MCLAUGHLIN	JOSEPH
20011990401	MOORE	CHARLES
10116421001	RUDY	MARY & JEFFREY